



Attorneys at Law

Adriana S. Kosovych
t 212.351.4527
f 212.878.8600
akosovych@ebglaw.com

June 21, 2017

VIA ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Campbell v. Empire Merchants, LLC*
No. 1:16 Civ. 5643-ENV-SMG

Dear Judge Vitaliano:

On behalf of Defendant Empire Merchants, LLC, we write jointly with counsel for Plaintiff to propose a joint briefing schedule in connection with Defendant's anticipated Rule 56 motion for summary judgment, as directed in Your Honor's Order dated June 13, 2017. The parties' proposed joint briefing schedule is as follows:

- September 18, 2017 – deadline for Defendant to serve Rule 56 motion for summary judgment
- October 23, 2017 – deadline for Plaintiff to serve opposition to Defendant's motion
- November 21, 2017 – deadline for Defendant to serve reply and to file fully briefed motion for summary judgment

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Adriana S. Kosovych

Adriana S. Kosovych

cc: Walker G. Harman, Esq. (via ECF)
Edgar M. Rivera, Esq. (via ECF)
Owen Laird, Esq. (via ECF)